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February 23, 2012

## **Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Mon-Cre Telephone Cooperative, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer  
Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

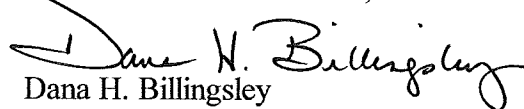
Dear Ms. Dortch:

On behalf of Mon-Cre Telephone Cooperative, Inc. ("Mon-Cre"), please find attached the annual CPNI Compliance Certification ("Certification") for Mon-Cre for the year 2011 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date. Simultaneously, Mon-Cre has also provided one copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Enclosure

cc: David Hubbard  
Best Copy and Printing, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 23, 2012

Name of company covered by this certification: Mon-Cre Telephone Cooperative, Inc.

Form 499 Filer ID: 806382

Name of signatory: Brett Sikes

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") rules and policies, Mon-Cre Telephone Cooperative, Inc. states as follows:

I, Brett Sikes, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosures of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Brett Sikes

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF  
MON-CRE TELEPHONE COOPERATIVE, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Mon-Cre Telephone Cooperative, Inc. (hereinafter "Mon-Cre") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Mon-Cre:

1. I have personal knowledge that Mon-Cre has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Mon-Cre obtains written approval for the use of its customers' CPNI and that Mon-Cre has notified its customers of their right to restrict Mon-Cre's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Mon-Cre has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Mon-Cre has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Mon-Cre has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Mon-Cre implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Mon-Cre maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Mon-Cre retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Mon-Cre has established a supervisory review process regarding Mon-Cre's compliance with the Federal Communications Commission's rules for outbound marketing situations and that the company maintains records of such compliance for a minimum period of one (1) year. Mon-Cre's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Mon-Cre has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Mon-Cre, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Mon-Cre to enforcement action.

Executed on this 16<sup>th</sup> day of February, 2012.

MON-CRE TELEPHONE COOPERATIVE, INC.

By: Brett Sikes

Printed: Brett Sikes

As Its: President